

ILLINOIS COMMERCE COMMISSION

DOCKET No. 13-0240

REBUTTAL TESTIMONY

OF

TIM CLAWSON

Submitted on Behalf Of

**AMEREN ILLINOIS COMPANY D/B/A
AMEREN ILLINOIS**

October 9, 2013

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I. INTRODUCTION

A. Witness Identification

Q. Please state your name and business address.

A. My name is Tim Clawson. My business address is 2655 N. Martin Luther King Dr., Decatur, IL 62526.

Q. By whom are you employed and in what capacity?

A. I am employed by Ameren Illinois Company d/b/a Ameren Illinois ("Ameren Illinois," "AIC," or "the Company") as the Superintendent of Meter Shops.

Q. Please describe your educational background and relevant work experience.

A. See my Statement of Qualifications, attached as an Appendix to this testimony.

Q. What are your current responsibilities?

A. I am responsible for the operation of three electric and gas meters shops in Illinois. In this role I oversee the testing and inventory management of the gas and electric meters passing through these facilities.

B. Purpose, Scope and Identification of Exhibits

Q. What is the purpose of your rebuttal testimony?

23 A. The purpose of my rebuttal testimony is to respond specifically to the portions of
24 Mr. Crane's rebuttal testimony in which he poses certain questions about Ameren Illinois'
25 Meter Management System ("MMS"). I discuss that system, and the information
26 contained therein, in further detail and attempt to explain how certain information
27 contained in MMS corresponds with the information presented in the AMR History Log
28 attached to Ameren Illinois witness Ms. Jodi Cannon's direct testimony as Ameren Ex.
29 1.1. Ms. Cannon also provides some complimentary discussion on several of these
30 points.

31 **Q. Are you sponsoring any exhibits in conjunction with your testimony?**

32 A. Yes, I am sponsoring the following exhibits:

- 33 • Ameren Ex. 4.1 – Screenshots of 12 of the 14 MMS Tabs
- 34 • Ameren Ex. 4.2 – Exported Information from the 2 Remaining MMS
35 Tabs plus Information from the MMS Inventory History Table

36 **Q. Isn't all of the information presented in your exhibits derived from MMS? If**
37 **so, why not present the information as one uniform exhibit, containing all**
38 **"screenshot" style depictions of the MMS tabs?**

39 A. All of the information contained in my exhibits was extracted directly from MMS.
40 By way of background, the MMS interface screen displays 14 individual tabs, each of
41 which contains certain meter-related information. The information contained in 12 of
42 these 14 tabs was easily captured in traditional screenshots, which are presented in
43 Ameren Ex. 4.1. The format of the remaining 2 tabs – the "Site" and "Factors" tabs – did
44 not format appropriately when captured as a screenshot. The content of those two tabs
45 has been exported to Excel and is presented in Ameren Ex. 4.2. In addition, Ameren Ex.

4.2 contains information from the MMS Inventory History Table, which is presented as a separate MMS feature and may contain information relevant to this case¹.

Q. Wasn't some information from MMS attached to Ms. Cannon's direct testimony?

A. Yes. Attached in Ameren Ex. 1.2 were a screenshot of the MMS "Attributes" tab and a *partial* screenshot of the MMS "Site" tab. Unfortunately, several columns were "cut off" of the right side of the "Site" tab screenshot. That information is relevant for reasons explained in further detail below. The full version of the MMS "Site" tab is now presented in Ameren Ex. 4.2.

Q. Does MMS confirm that meter in question was "Removed" on December 15, 2009, as stated in the direct testimony of Ms. Cannon?

A. Yes. Although this is not readily apparent from Ameren Ex. 1.2, the full version of the "Site" tab presented in Ameren Ex. 4.2 shows that the meter was removed on December 15, 2009. Please see cell W5.

Q. If the meter was reinstalled on its base on April 16, 2010, as stated in the direct testimony of Ameren Illinois witness Ms. Cannon, why does MMS not reflect the corresponding "Set" date?

A. As noted in Ms. Cannon's direct testimony, at the time of the April 16, 2010 reinstallation, CSS was not updated to reflect the fact that said installation had taken place. The CSS records "feed" or "drive" the corresponding entries in MMS. Had CSS

¹ Information presented in Cells W2, W3 and W4 of this table has been redacted to protect employee names from disclosure.

66 been updated to show that the meter was reinstalled on April 16, 2010, MMS would have
67 shown a corresponding "Set" date. Without the CSS driver, MMS has no independent
68 source from which to populate this field.

69 **Q. Would you agree that the meter in question, Meter No. 98367529, was**
70 **removed from Mr. Crane's property on November 13, 2012?**

71 A. No. As indicated above, MMS indicates that the meter in question was finally
72 removed from Mr. Crane's property on January 29, 2013.

73 **Q. How do you respond to Mr. Crane's allegation that Ameren Illinois' records**
74 **appear to indicate that no meter was located on his property between November**
75 **2012 and January 2013?**

76 A. Based on the truncated version of the MMS "Site" tab presented in Ameren Ex.
77 1.2, I can see how Mr. Crane would draw that conclusion. As indicated above, the full
78 version of MMS presented in Ameren Ex. 4.2 confirms that the meter was removed on
79 January 29, 2013.

80 **Q. Please respond to Mr. Crane's concerns that Ameren Ex. 1.2 appears to show**
81 **that the meter in question was "Remove[d]" on November 13, 2012, but that**
82 **Ameren Ex. 1.1 appears to demonstrate AMR usage activity until January 19, 2013?**

83 A. Again, our records indicate that the meter in question was physically removed on
84 January 29, 2013. Based on Mr. Crane's concerns about the gap in the AMR history
85 records, Ms. Cannon provides and discusses Mr. Crane's AMR history during the January
86 19, 2013 to January 29, 2013 timeframe in her rebuttal testimony and related exhibit.
87 Ameren Ex. 3.1.

88 **Q. Why does MMS not display the date upon which meter number 98368867**
89 **was installed?**

90 A. MMS shows meter 98368867 was installed on January 29, 2013. Please see
91 Ameren Ex. 1.2, p. 2 (3rd Row of the bottom screenshot).

92 **II. CONCLUSION**

93 **Q. Does this conclude your rebuttal testimony?**

94 A. Yes, it does.

APPENDIX

STATEMENT OF QUALIFICATIONS

TIM CLAWSON

I have been with Ameren Illinois for 25 years in various positions. I started in Customer Service for legacy company Illinois Power. I have also worked in the Decatur Call Center, Customer Service Operations, Billing and Field Metering. I have been affiliated with the Meter Shops since 2005.